

FILED HONORABLE BARBARA LINDE  
2018 DEC 12 03:50 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 18-2-18114-3 SEA

SUPERIOR COURT OF WASHINGTON  
IN AND FOR KING COUNTY

OMAR ABDUL ALIM, an individual;  
MICHAEL THYNG, an individual; THE  
SECOND AMENDMENT FOUNDATION,  
INC., a Washington non-profit corporation; and  
NATIONAL RIFLE ASSOCIATION OF  
AMERICA, INC.; a New York non-profit  
association;

## Plaintiffs,

V.

CITY OF SEATTLE, a municipality; JENNY DURKAN, Mayor of the City of Seattle, in her official capacity; SEATTLE POLICE DEPARTMENT, a department of the City of Seattle; and CARMEN BEST, Chief of Police, in her official capacity,

## Defendants.

TO: Clerk of the Court;

AND TO: All parties and their counsel of record.

Plaintiffs Omar Abdul Alim, Michael Thyng, The Second Amendment Foundation, and National Rifle Association of America, Inc. (“Plaintiffs”) seek review by Division I of the Washington State Court of Appeals of the following Orders:

**PLAINTIFFS' NOTICE OF APPEAL TO THE COURT OF APPEALS, DIVISION I – 1**

**CORR CRONIN LLP**  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154-1051  
Tel (206) 625-8600  
Fax (206) 625-0900

1. Order entered October 19, 2018: Order Granting Motion to Dismiss, or in the Alternative, for a More Definite Statement; and

2. Order entered November 20, 2018: Order Denying Plaintiffs' Motion for Reconsideration.

A copy of the above-referenced Orders are attached to this Notice of Appeal as Exhibit A.

DATED: December 12, 2018.

## CORR CRONIN LLP

s/ Eric A. Lindberg

Steven W. Fogg, WSBA No. 23528  
Eric A. Lindberg, WSBA No. 43596  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154  
(206) 625-8600 (Phone)  
[sfogg@corrcronin.com](mailto:sfogg@corrcronin.com)  
[elindberg@corrcronin.com](mailto:elindberg@corrcronin.com)  
*Attorneys for Plaintiffs*

The names and addresses of counsel for the parties are listed below:

Steven W. Fogg, WSBA No. 23528  
Eric A. Lindberg, WSBA No. 43596  
CORR CRONIN LLP  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154  
(206) 625-8600 (Phone)  
[sfogg@corrchronin.com](mailto:sfogg@corrchronin.com)  
[elindberg@corrchronin.com](mailto:elindberg@corrchronin.com)

*Attorneys for Plaintiffs*

Daniel J. Dunne, WSBA No. 16999  
ORRICK HERRINGTON SUTCLIFFE  
701 Fifth Avenue, Suite 5600  
Seattle, WA 98104  
Phone: (206) 839-4395  
ddunne@orrick.com

### *Attorneys for Defendants*

**PLAINTIFFS' NOTICE OF APPEAL TO THE COURT OF APPEALS, DIVISION I – 2**

**CORR CRONIN LLP**  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154-1051  
Tel (206) 625-8600  
Fax (206) 625-0900

1 Peter S. Holmes (Seattle City Attorney)  
2 Kent C. Meyer, WSBA No. 17245  
3 Carlton W.M. Seu, WSBA No. 26830  
4 Seattle City Attorneys Office  
5 701 Fifth Avenue, Suite 2050  
6 Seattle, WA 98104-7097  
7 kent.meyer@seattle.gov  
8 carlton.seu@seattle.gov

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
6 *Attorneys for Defendant City of Seattle*

PLAINTIFFS' NOTICE OF APPEAL TO THE COURT OF  
APPEALS, DIVISION I – 3

**CORR CRONIN LLP**  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154-1051  
Tel (206) 625-8600  
Fax (206) 625-0900

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

**CERTIFICATE OF SERVICE**

The undersigned certifies as follows:

1. I am employed at Corr Cronin LLP, attorneys for Plaintiffs herein.
2. On December 12, 2018, I caused a true and correct copy of the foregoing document

to be served on the following parties in the manner indicated below:

**Attorneys for Defendants:**

Daniel J. Dunne, WSBA No. 16999  
Orrick Herrington Sutcliffe  
701 Fifth Avenue, Suite 5600  
Seattle, WA 98104  
Phone: (206) 839-4395  
ddunne@orrick.com

Via ECF  
 Via U.S. Mail  
 Via Messenger Delivery  
 Via Overnight Courier  
 Via electronic mail

**Attorneys for Defendant City of Seattle:**

Peter S. Holmes (Seattle City Attorney)  
Kent C. Meyer, WSBA #17245  
Carlton W.M. Seu, WSBA No. 26830  
Seattle City Attorneys Office  
701 Fifth Avenue, Suite 2050  
Seattle, WA 98104-7097  
kent.meyer@seattle.gov  
carlton.seu@seattle.gov

Via ECF  
 Via U.S. Mail  
 Via Messenger Delivery  
 Via Overnight Courier  
 Via electronic mail

Clerk, Court of Appeals, Division I  
One Union Square  
600 University Street  
Seattle, WA 98101

Via ECF  
 Via U.S. Mail  
 Via Messenger Delivery  
 Via Overnight Courier  
 Via electronic mail

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED: December 12, 2018, at Seattle, Washington.

*s/ Christy A. Nelson*  
Christy A. Nelson

PLAINTIFFS' NOTICE OF APPEAL TO THE COURT OF  
APPEALS, DIVISION I – 4

**CORR CRONIN LLP**  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154-1051  
Tel (206) 625-8600  
Fax (206) 625-0900